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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Mark Lewis,

Plaintiff,

vs.

R&L CARRIERS, Inc., an Ohio Corporation
R&L CARRIERS SHARED SERVICES,
LLC, an Ohio Limited Liability Company,

Defendants.

CASE NO. 2:17-cv-02793-RFB-CWH

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(Second Request)

Plaintiff Mark Lewis and Defendants R&L Carriers, Inc. and R&L Carriers Shared Services, LLC, by and through their respective counsel (collectively, the “Parties”), for good cause shown, hereby stipulate and agree to extend all discovery deadlines in this matter by 60 days. This request complies with Local Rule (“LR”) 6-1, 6-3, 7-1, and 26-4, and is based on good cause because the litigation of this matter will be best served by the proposed extension. This is the Parties’ second extension request.

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I. GOOD CAUSE FOR EXTENSION TO COMPLETE DISCOVERY

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule 6-1, there exists good cause to grant this extension to allow the parties to coordinate depositions with Plaintiff's treating physicians. Specifically, the parties have tried to coordinate dates to take the depositions of several of Plaintiff's treating physicians; however, the schedules are not compatible, until after the current August 29 discovery cut-off. Accordingly, the parties jointly believe that good cause exists to extend the discovery deadlines for sixty (60) days.

II. DISCOVERY COMPLETED TO DATE

To date the Parties have completed the following discovery:

1. Defendants served their initial disclosures on or about January 23, 2018.
2. Defendants served written discovery to Plaintiff on February 8, 2018.
3. Plaintiff served his responses to Defendants' written discovery on or about April 4, 2018.
4. Plaintiff served his initial disclosures on or about April 4, 2018.
5. Plaintiff served written discovery to Defendants on April 4, 2018.
6. Defendants served their responses to Plaintiff's written discovery on May 4, 2018.
7. Plaintiff's deposition was taken on April 24, 2018.

III. DISCOVERY TO BE COMPLETED

The parties anticipate service of additional interrogatories, requests for production of documents and things, requests for admission plus party and non-party depositions.

IV. PROPOSED NEW DEADLINES

Deadline	Current	Proposed
Discovery cut-off	August 29, 2018	October 29, 2018
Amend pleadings/add parties	May 31, 2018	July 30, 2018
Interim Status Report	July 2, 2018	August 31, 2018
Expert witness disclosures	July 2, 2018	August 31, 2018
Rebuttal expert witness disclosures	July 30, 2018	September 28, 2018
Dispositive motions	October 1, 2018	November 30, 2018
Pre-Trial Order	October 30, 2018	December 31, 2018

In the event dispositive motions are filed, the date for filing the Joint Pre-Trial Order shall be suspended until thirty (30) days after decision of the dispositive motions or further order of the Court.

V. CONCLUSION

For the foregoing reasons, the Parties respectfully request that the Court grant their request to continue the discovery deadlines detailed herein.

Dated: July 12, 2018

SNELL & WILMER L.L.P.

By: /s/ Paul Swenson Prior
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Dated: July 12, 2018

LAW OFFICES OF MICHAEL P.
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By: /s/ Michael P. Balaban
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Attorneys for Plaintiff Mark Lewis

ORDER

IT IS ORDERED.

DATED July 16, 2018


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES (Second Request)** by the method indicated:

_____	U.S. Mail
_____	U.S. Certified Mail
_____	Facsimile Transmission
_____	Overnight Mail
_____	Federal Express
_____	Hand Delivery
<u> X </u>	Electronic Filing
_____	Electronic Mail

and addressed to the following:

Michael P. Balaban
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Attorneys for Plaintiff Mark Lewis

DATED July 12, 2018

/s/ Maricris Williams
An Employee of Snell & Wilmer L.L.P.

4843-5064-7405